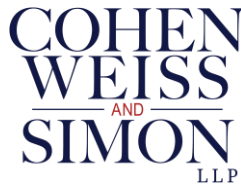


# **Exhibit I**



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April 26, 2024

Via Email: [lewis@clm.com](mailto:lewis@clm.com)

Alan S. Lewis  
Carter Ledyard & Milburn LLP  
28 Liberty Street  
New York, NY 10005

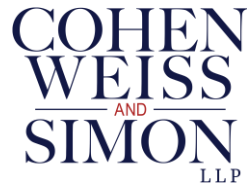
Dear Mr. Lewis:

This firm is General Counsel to the Affiliated Musicians of Greater New York Local 802, AFM (“Local 802” or the “Union”).

Local 802 has considered your request that it “perform its contractual and solemn duty to Mr. Wang by demanding his immediate reinstatement, and if the Philharmonic does not immediately comply, commencing legal action to compel its compliance.” You contend that by taking Mr. Wang off the schedule, the Philharmonic “violate[d] the CBA by relatedly violating the terms of the mandatory reinstatement provision of the [Bloch] arbitration award.” We disagree. That Bloch award, as you know, required the New York Philharmonic, on April 4, 2020, to “reinstate[] the grievants and [make them] whole for all contractual benefits lost, including full back pay and seniority.” The New York Philharmonic fully complied with the award more than four years ago. The award certainly does not give Mr. Wang a guarantee of lifetime employment regardless of whether new allegations of wrongdoing or different circumstances arise. In any event, the collective bargaining agreement mandates that members of the Orchestra be “employed” for 52 weeks each year; it does not guarantee that members are placed on the schedule for any or all performances or rehearsals.

Additionally, on April 17, 2024, the NY Philharmonic engaged an investigator to determine whether there were any new or different allegations of sexual misconduct by any members of the Orchestra, including your client. Local 802 has determined to await the outcome of that investigation before determining how to proceed here.

Finally, you ask that the Union “cease and desist from making any further statements endorsing Mr. Wang’s removal, suspension or non-assignment.” The Union has made no such statements. The statements that the Union has made, when read in context, refer to the “good first steps” the Philharmonic is taking towards the larger goal of “eras[ing] the culture of complicity that has raged at the NY Philharmonic for too long.” The Union is committed to taking appropriate steps to ensure that the New York Philharmonic provides a safe workplace for *all* members of the Orchestra.



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Very truly yours,

Susan Davis